

JD:MTK
F. #2016R00664

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

17M 244

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UNITED STATES OF AMERICA

TO BE FILED UNDER SEAL

- against -

AFFIDAVIT AND
COMPLAINT IN
SUPPORT OF AN
ARREST WARRANT

JASON CHRISTOPHER HUGHES,
also known as "Michael Rudra Nath"
and "Luis Manuel Arsupial,"

(18 U.S.C. § 875(c))

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

BRADFORD PRICE, being duly sworn, deposes and states that he is a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

In or about and between March 2015 and September 2015, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant JASON CHRISTOPHER HUGHES, also known as "Michael Rudra Nath" and "Luis Manuel Arsupial," did transmit in interstate or foreign commerce communications containing threats to injure the person of another, to wit: "Victim-1" and "Victim-2," individuals whose identities are known to the United States Attorney.

(Title 18, United States Code, Section 875(c))

The source of your deponent's information and the grounds for his/her belief are as follows:¹

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been involved in the investigation of numerous cases involving interstate stalking and the transmission of threatening communications. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendant's criminal history record; and from reports of other law enforcement officers involved in the investigation.

Background with Victim-1

2. The defendant JASON CHRISTOPHER HUGHES and Victim-1 became pen pals in the late 1970s when both were in the 4th grade. During that time period, Victim-1 stated that the defendant sent her hundreds of letters detailing the terrible nature of his home and life. At first, Victim-1 responded to the defendant's letters with words of support and comfort. However, the subject matter of the defendant's letters became increasingly dark and threatening over a period of years. When Victim-1 attempted to break off correspondence with the defendant due to the threatening nature of his letters, the defendant replied, in substance and in part, that Victim-1 and his cats were the only two reasons why he was not killing himself. Victim-1 also reported that the defendant's letters referenced the teachings of the occult, cannibalism, writings on anarchism, and his hatred of authority.

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

3. During the course of the late 1980s and 1990s, the defendant's letters to Victim-1 became increasingly disturbing and threatening. During Victim-1's freshman year at college, the defendant showed up unannounced to Victim-1's dormitory after Victim-1 had ceased responding to his letters. In subsequent letters following the visit, the defendant threatened to kill Victim-1's family and loved ones.

4. Victim-1 stated that she attempted to obtain restraining orders against the defendant JASON CHRISTOPHER HUGHES, but since he resided in Billings, Montana and Victim-1 resided in Kansas, she was unable to procure the orders.

5. After her marriage, Victim-1 reported that the defendant began sending threatening letters to Victim-1's in-laws which stated that he knew Victim-1 was now married.

6. Due to the defendant's incessant letter writing and stalking, Victim-1 and her husband moved overseas where she subsequently became a teacher and attempted to keep a low profile.

The Threatening E-Mails

7. Victim-1 was able to avoid all contact with the defendant JASON CHRISTOPHER HUGHES for approximately twenty years. However, in or about March 2015, Victim-1 reported that she received multiple threatening emails from the defendant. Between March 16, 2015 and March 20, 2015, Victim-1 received approximately 23 emails from the defendant. Victim-1 believes that HUGHES obtained her email address from a school website that provided information for parents about their children and teachers.

8. Victim-1 was able to determine that the emails came from the defendant because, among other things, they referenced their relationship as childhood pen pals and

because the author of the emails noted that he hailed from Billings, Montana. Further, one email noted that the “the name ‘Jason’ was a curse.” As stated above, the defendant’s full name is JASON CHRISTOPHER HUGHES.

9. The March 2015 emails were sent from the address “rayjohnngplus@gmail.com” with an associated profile name of “Raymond Johnson.”

10. The emails received by Victim-1 between March 16, 2015 and March 20, 2015 contained such threatening statements as:

- i. “consider yourself very very lucky indeed that I don’t dare bring Darkness right to your classroom or front door. See I don’t like children. I actually hate them. I laugh when one of them is abducted or falls under a train or is eaten by wild dogs. This is who I am, and You Helped Create Me.”
- ii. “Things I have done . . . they would cool your blood beyond ice. You would wish you had never been born to not have known some of the horrendous things I have done. but since YOU were the original person who inspired me to choose Evil? EVIL BE THOU MY GOOD! know this: I did my early Works? I DID THEM IN YOUR NAME! and no I will never get caught . . . I take care upon care upon care to bury very, very deeply”
- iii. “they last thing they ever hear?” “it is a __name__ . . . whispered and then the All Too Brief . . .end. it is better to kill a soul, that NEVER ENDS.”
- iv. “I have decided to come out of ‘retirement’” “I am going to do something . . something really terrible . . and it will be? Because I am reminded of YOU. You will again be the inspiration for my Work. road trip I never shit where I eat. taking the wet_far away is the single most important thing one can do . . . never get caught! You should have apologized, given this opportunity. You chose to remain silent. Someone else gets to pay the bill now . . . someone young . . . bright . . . hopeful . . .like a college student.

11. The defendant JASON CHRISTOPHER HUGHES also sent Victim-1 a link to a story from Smithsonian Magazine detailing the death of five children in a fire as well as personal information about Victim-1’s own children.

Background with Victim-2

12. Victim-2 has also been the recipient of threatening emails from the defendant using the email address “daseindawg@mail.com”.

13. In or about September 2015, Victim-2 was exchanging social media posts with Jane Doe #1, an individual whose identity is known to the United States Attorney’s Office. Jane Doe #1 has also been a victim of threatening emails from the defendant. Shortly after this exchange, Victim-2 began to receive emails on both her work and personal email accounts from an individual named “Raymond Johnson,” later identified as the defendant JASON CHRISTOPHER HUGHES.

The Threatening E-Mail

14. On or about September 19, 2015, “Raymond Johnson,” later identified as the defendant JASON CHRISTOPHER HUGHES, emailed Victim-2 using the “daseindawg@mail.com” address and sent the following threatening statements:

How to Make a Your Own Pet Owl

Take one human. smash the arms, legs knees with a sledge hammer. bend the twisted limbs around a perch in a large iron cage. bind the limbs so they grow into place. insert a PEG tube directly into the stomach for liquid feeding. nasal feeding gets in the way of the next stage. bust out all of the teeth. remove the tongue. blinding is a nice option at this stage, but you might want to wait on that to set the unfinished owl in front of a large mirror for some weeks. cut the cheeks midline, break the lower jaw and collapse the pallet. at this point a stomach tube might be left with the facial remnants formed into a “beak.” keep a bucket underneath your new Owl to catch wastes. have fun poking your Owl with thin, sharp bamboo slivers. keep the owl on constant multiple antibiotics, and switch these up so skin sepsis doesn’t set in.

The Identification of the Defendant as the Author of the E-Mails

15. The investigation into the defendant JASON CHRISTOPHER HUGHES has revealed that he owns multiple domain names including “sociallystunning.org” and “socially-stunning.org.” These domain names are hosted by Dynadot, a domain name registrar and web hosting company. Subpoena returns from Dynadot revealed that HUGHES had registered the aforementioned domain names using the email addresses “rayjohngplus@gmail.com” and “rayqsmuckles@gmail.com”. The provided registrant name is “M R Nath.” The domain names are paid for using a Paypal account which is associated with the email address “nasruda@rocketmail.com (Michael Nath)”. The investigation has revealed that “Michael Rudra Nath” is an alias that HUGHES has previously utilized.

16. On or about April 20, 1987, HUGHES legally changed his name in the State of Texas to “Luis Manuel Arsupial.”

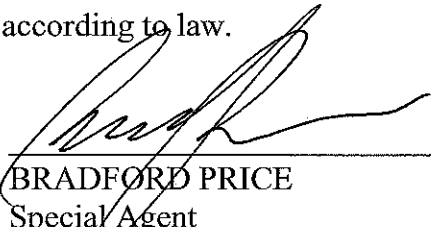
17. On or about January 2, 2004, HUGHES applied for a United States passport under the name “Luis Manuel Arsupial.” The application listed “Hughes” as a name previously utilized by the applicant. HUGHES subsequently applied for another passport under the name “Michael Rudra Nath.” He listed “Luis Manuel Arsupial” as the name in which his most recent passport was issued. The picture of the individual attached to the “Michael Rudra Nath” application matches the picture of the individual in the “Luis Manuel Arsupial” application. I have examined both these pictures and have confirmed that the individual in the photos is the defendant JASON CHRISTOPHER HUGHES.

18. The Dynadot subpoena returns revealed that HUGHES utilized various Internet Protocol (“IP”) addresses to logon to Dynadot. One of these IP addresses,

100.12.125.80 has been traced back to a residence located at 19 Crescent Drive, Staten Island, New York. I have confirmed that HUGHES' last known address is 17 Crescent Drive, Staten Island, New York (a location at which he has been observed by agent surveillance). Thus, there is probable cause to believe that HUGHES has simply logged into his neighbor's WIFI account.

19. I request that the Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the affidavit and arrest warrant. Based upon my training and experience, I have learned that criminals actively search for criminal affidavits and arrest warrants via the internet. Therefore, premature disclosure of the contents of this affidavit and related documents will seriously jeopardize the investigation, including by giving targets an opportunity to flee or continue flight from prosecution, destroy or tamper with evidence and change patterns of behavior.

WHEREFORE, your deponent respectfully requests that the defendant JASON CHRISTOPHER HUGHES, be dealt with according to law.


 BRADFORD PRICE
 Special Agent
 Federal Bureau of Investigation

Sworn to before me this
 16th day of March, 2017



T. BLOOM
 UNITED STATES MAGISTRATE JUDGE
 EASTERN DISTRICT OF NEW YORK